

FACT SHEET

DRAFT CLASS 3 PERMIT MODIFICATION TO REVISE THE GROUND WATER MONITORING NETWORK, MONITORING PARAMETERS, MONITORING FREQUENCY, AND DATA ANALYSIS FOR THE WASTE CALCINING FACILITY POST-CLOSURE CARE PERMIT ON THE IDAHO NUCLEAR TECHNOLOGY AND ENGINEERING CENTER (INTEC) LOCATED AT THE IDAHO NATIONAL LABORATORY EPA ID NO. ID4890008952

This fact sheet sets forth the principal facts pertaining to a draft Class 3 Permit Modification Request the Idaho Department of Environmental Quality (DEQ) is proposing to approve. The request sets forth the applicable permit conditions the DEQ intends to require of the United States Department of Energy (DOE).

A. PURPOSE OF THE PERMITTING PROCESS

The purpose of the permitting process is to design specific administrative and operational requirements under which the Permittee will operate to comply with the Idaho Hazardous Waste Management Act (HWMA) of 1983, as amended, and regulations promulgated thereunder by the DEQ.

The requested modifications do not alter the ability of the Permittee to provide continued protection of human health and the environment under HWMA.

The initial permit modification request to revise the post-closure care monitoring protocols for the Waste Calcining Facility (WCF) Permit was submitted on February 27, 2007, to satisfy a compliance schedule requirement found in the original WCF Post-Closure Permit. Concurrent with the modification submittal, the applicant conducted the required sixty day comment period and public meeting. DEQ reviewed the modification request, and, subject to DEQ imposed changes, proposes to approve the draft Class 3 Permit Modification.

B. PROCEDURES FOR REACHING A FINAL DECISION

DEQ has prepared a revised draft WCF Post-Closure Permit to reflect the requested changes. IDAPA 58.01.05.013 [40 CFR § 124.10(b)(1)] requires that the public be given at least forty five (45) calendar days to comment on the draft Permit presented for approval under the HWMA. The comment period will begin on May 8, 2007, and will end at 5:00 p.m. on June 21, 2007. Any person interested in commenting must do so within this forty-five (45) calendar day comment period. This public participation process for a Class 3 Permit Modification is consistent with the process for a new permit application except **that only the draft modifications to the permit are open for public comment**. Comments on previously issued portions of the partial permit, by regulation, will not be considered. Changed text is indicated in the draft. All persons

wishing to comment on the modified portions of the Partial Permit should submit comments in writing to:

*Mr. Robert Bullock
c/o Jennifer Shafer
Waste and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255
(208) 373-0502*

Comments should include all reasonable available references, factual grounds, and supporting material. As a Class 3 Permit Modification, only those conditions to be modified are reopened for comment in this Draft Permit in accordance with IDAPA 58.01.05.013 [40 CFR § 124.5].

If requested in accordance with IDAPA 58.01.05.013 [40 CFR §124.11], a public hearing may be held. Hearing requests must:

- be submitted in writing to the above address; and,
- state the nature of the issues proposed to be raised in the hearing.

DEQ will schedule a hearing if the Director finds, based on the request(s), there is a significant degree of public interest in the draft permit modifications. The public would be provided the required notice should a hearing be scheduled.

When making the final decision regarding the Permit Modification, DEQ will consider all written comments received during any public comment period; comments received during any public hearing; the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 et seq., and all other applicable federal, state, or local laws.

C. FACILITY/UNIT DESCRIPTION

The INL is a large (approximately 890 square miles) DOE-owned facility, co-operated by DOE and various contractors, and located in Bingham, Butte, and Jefferson Counties, Idaho. The WCF is located within the INTEC fence on the INL. The Waste Calcining Facility was used to calcine and evaporate aqueous waste generated from reprocessing spent nuclear fuel. The waste calciner operated from 1963 to 1981 and the evaporator system operated from 1983 until 1987. The WCF was closed under a DEQ approved closure plan with waste in place (landfill closure). A Post-Closure Care Permit was issued with an effective date of October 16, 2003. The original permit, through a compliance schedule, required DOE to further characterize the shallow perched water-bearing zone under the WCF.

D. MODIFICATION DESCRIPTION

DOE has completed the compliance schedule requirements. The proposed modifications to the permit reflect the findings of the characterization effort. The proposed modifications include:

1. Reduction of the monitored parameters from 33 to 19 based on over three years of analytical data. The remaining constituents include the primary constituents of concern, degradation products of the primary constituents, and any 40 CFR Part 264 Appendix IX (Ground Water Monitoring List) constituent found in any monitoring network well.
2. Adoption of background water quality data. Thirteen quarters of sampling data were used to establish the background water quality at the WCF location. The modification incorporates new statistical procedure for assessing future sampling results compared to the background values.
3. Changing the monitoring well network to eliminate wells that are dry and add wells that have adequate water to sample.
4. Reduction of sampling frequency from quarterly to semi-annually. The flow rate and direction and efforts to reduce recharge of this shallow zone justify this reduction of monitoring frequency.
5. Adoption of micro-purging techniques for well sampling efforts. CERCLA sampling at several sites on the INL has demonstrated the efficacy of micro-purging. Micro-purging helps assure there is adequate water available for sampling.
6. Removal of completed compliance schedule items.
7. Updating the permit attachment maps, figures, forms etc.
8. Incorporating the new floodplain data from the recently completed Bureau of Reclamation study.

Upon completion of this permit action, the permit will be reformatted and repaginated, as necessary, to incorporate the modification into the effective permit.

The requirements listed above are in addition to the general requirements common to all hazardous waste permits. The Permittee must: a) ensure the site is secure, b) maintain proper records; and, c) ensure the personnel are trained to properly and safely perform their job functions. The following documents must be maintained at the facility: (1) a complete and current copy of the Permit including attachments and tables, (2) the operating record, (3) inspection procedures, schedules, logs, and records, (4) personnel training requirements for each position and personnel training records for each individual involved with management of mixed waste at the WCF.

E. PERMIT ORGANIZATION

The Partial Permit is divided into six sections, with nine Attachments, as follows:

MODULE	TITLE
I	Standard Permit Conditions
II	General Facility Conditions
III	Ground Water Monitoring

ATTACHMENTS	TOPIC
1	Facility Description and RCRA Part A Application
2	Security, Inspections and Maintenance
3	Post-Closure Plan, including Monitoring protocols
4	Permit Modification Log

The proposed modifications are identified throughout the draft modified permit.